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March 8, 2021

VIA FOIAonline.gov

National FOIA Office
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW (2310A)
Washington, DC 20460

Re: Freedom of Information Act Request

To Whom It May Concern:

The undersigned hereby requests disclosure under the Freedom of Information Act, 5 U.S.C. § 552 et seq., and the implementing regulations of the Environmental Protection Agency ("EPA"), 40 CFR. § 2.100 et seq., of the following records:

1. All records in the EPA's possession, custody, or control related to its and/or the Georgia EPD's¹ investigation, sampling, and testing for Per- and polyfluoroalkyl substances ("PFAS") in or around Summerville, Georgia, Raccoon Creek (including its tributaries), the facility known as the "Raccoon Creek Treatment Plant," and/or the facility known as the "Goodwin Hill Tank," including any records of sampling plans; sampling access agreements; environmental sampling data, analysis, summaries, results, or conclusions (specifically including complete data packages from all laboratories analyzing samples for the presence of PFAS); chromatograms; reports; photographs; videotapes; surveys; engineering investigations or drawings; field notes; chain of custody forms; any other documents of work performed by or on behalf of the EPA and/or the EPD; and all communications (both internal and with external parties or other agencies) regarding any of the foregoing categories or that are otherwise related to the EPA's and/or the EPD's investigation, sampling, and testing for PFAS in or around Summerville, Georgia, Raccoon Creek (including its tributaries), the Raccoon Creek Treatment Plant, and/or the Goodwin Hill Tank.
2. All records in the EPA's possession, custody, or control relating to inspections, compliance, or enforcement under the Clean Water Act, 33 U.S.C. § 1251 et seq.,

¹ "EPD" refers to the Environmental Protection Division of the Georgia Department of Natural Resources.

at the Raccoon Creek Treatment Plant and/or the Goodwin Hill Tank in or around Summerville, Georgia, including any records of consent decrees; enforcement orders; notices of violation; compliance inspection reports; engineering assessments; corrective actions; sampling plans; sampling access agreements; environmental sampling data, analysis, summaries, results, or conclusions (specifically including complete data packages from all laboratories analyzing samples for the presence of PFAS); chromatograms; reports; photographs; videotapes; surveys; engineering investigations or drawings; field notes; chain of custody forms; any other documents of work performed by or on behalf of the EPA and/or the EPD; and all communications (both internal and with external parties or other agencies) regarding any of the foregoing categories or that are otherwise related to inspections, compliance, or enforcement under the Clean Water Act, 33 U.S.C. § 1251 et seq., at the Raccoon Creek Treatment Plant and/or the Goodwin Hill Tank.

In the event any of the records described above have been transferred to the National Archives and Records Administration pursuant to 44 U.S.C. § 2107, please request that such records be returned to the EPA so that the EPA may respond to this request.

The records containing the requested information are believed to be publicly available and not exempt from disclosure under any of the provisions of Section 552(b) of the Freedom of Information Act, 5 U.S.C. § 552(b). In the event you decide to withhold entirely, or otherwise, any portion of the documents containing the above-requested information, please supply a detailed statement describing the nature of any such records and explaining with particularity the basis for each such decision.

The undersigned will pay the reasonable standard charges for the actual search time and copying fees required in complying with this request to the extent provided in 40 CFR Section 2.107. In the event such fees may be in excess of \$500.00, please contact me for the purpose of discussing possible alternatives. The requested records may be sent to the following address:

Rebecca K. Hall
Lightfoot, Franklin & White LLC
The Clark Building
400 20th Street North
Birmingham, AL 35203

I will anticipate your response within twenty working days of your receipt of this request pursuant to 40 CFR Section 2.104.

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Thank you for your cooperation in this matter. If you have any questions or comments concerning the nature or extent of the information requested herein, please do not hesitate to call me.

Very Truly Yours,

/s/ Rebecca K. Hall